

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELAND DIVISION**

**IN RE:**

**NAGHAM TAHIR ALQANNACE**

**DEBTOR**

**IN PROCEEDINGS UNDER CHAPTER 13**

**CASE NO: 24-11322**

**JUDGE: SUZANA KRSTEVSKI KOCH**

**OBJECTION TO CONFIRMATION OF PLAN**

Now comes the secured creditor, PHH Mortgage Corporation, (“Creditor”) as the holder of the mortgage lien against the debtor’s principal place of residence located at 20520 Detroit Rd, Rocky River, OH 44116 and hereby objects to confirmation of the Debtor’s plan.

Creditor states that the Debtor’s proposed plan indicates payment of \$10,315.00 in arrearages to PHH Mortgage Corporation. However, the arrearage claim to be filed by PHH Mortgage Corporation is in the approximate amount of \$31,485.36.

WHEREFORE, PHH Mortgage Corporation objects to the confirmation of the debtor’s proposed plan.

Respectfully Submitted,

/s/ C. Wesley Pagles  
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## **CERTIFICATE OF SERVICE**

The undersigned does hereby certify that on April 23, 2024, a copy of the foregoing was served to the following:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

William Francis Perry, on behalf of Nagham Tahir AlQannace, debtor(s), at  
[info@sperrylaw.com](mailto:info@sperrylaw.com)

Lauren A Helbling, on behalf of the Chapter 13 Trustee's office at  
[lhelbling13@ecf.epiqsystems.com](mailto:lhelbling13@ecf.epiqsystems.com)

And by regular U.S. mail, postage prepaid, on:

Nagham Tahir AlQannace, 20520 Detroit Rd, Rocky River, OH 44116

/s/ C. Wesley Pagles  
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